

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

- against -

HOLY BAGEL CAFÉ II, INC. d/b/a BAGEL CAFÉ d/b/a
BAGEL CAFÉ II, SANG CHON LEE, EN SEOOUN LEE
and LUDWIN R. SANCHEZ a/k/a ROBERTO SANCHEZ

Defendants.

Case No. 15-CV-3620

**NOTICE OF MOTION TO
WITHDRAW AS COUNSEL
FOR DEFENDANTS HOLY
BAGEL CAFÉ II INC, SANG
CHON LEE AND EN SEOOUN
LEE**

PLEASE TAKE NOTICE THAT, upon the annexed affirmation of Jian Hang, attorney for the Defendants HOLY BAGEL CAFÉ II, INC, d/b/a BAGEL CAFÉ, d/b/a BAGEL CAFÉ II, SANG CHON LEE, and EN SEOOUN LEE sworn to on May 25, 2016 and upon all prior proceedings heretofore had herein, Hang & Associates, PLLC will move this Court before the Honorable Joseph F. Bianco for an order:

1. Pursuant to Local Civil Rule 1.4 to withdraw Hang & Associates, PLLC as counsel of record on behalf of Defendants Holy Bagel Café II, Inc., Sang Chon Lee and En Seoun Lee.
2. To stay this action for thirty (30) days to allow Defendants to retain replacement counsel.
3. For such other relief as the Court deems just and appropriate.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Local Civil Rule 6.1(b), any opposing affidavits and answering memorandum of law must be served within fourteen (14) days after service of the moving papers.

Dated: May 25, 2016

HANG & ASSOCIATES, PLLC

By: s/ William Brown

William Brown, Esq.

Hang & Associates, PLLC

136-18 39th Ave. Suite 1003

Flushing, New York 11354

(718) 353-8588

Attorneys for Defendants

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing Notice of Motion to Withdraw as Counsel of Record, and the annexed exhibits, were served upon all the parties of record by the Electronic Case Filing system, and served by First Class mail upon the above named Defendants.

Dated: May 25, 2016

/s/William Brown
William Brown, Esq.
Hang & Associates, PLLC
136-18 39th Ave. Suite 1003
Flushing, New York 11354
(718) 353-8588
Attorneys for Defendants